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**RECEIVED***By OGC/CELA at 10:12 am, Mar 30, 2023*

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March 23, 2023

Kenneth Sealls  
Federal Election Commission  
Washington, DC 20463

RE: MUR 7690

Dear Mr. Sealls:

I write on behalf of Lawrence Kahele Lum Kee in response to your letter r dated March 7, 2023.

Mr. Lum Kee began working with Navatek, LLC ("Navatek"), in May 2019. He was hired as an Accountant where his primary duty was to help implement a new General Ledger ("GL") software system since he had experience with implementations in the past. Mr. Lum Kee reported directly to the Chief Financial Officer ("CFO"). It should be noted that the Finance Department at the time had a CFO, Controller, and Assistant Controller.

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Within about a month after his start date, the Controller resigned and Mr. Lum Kee was named the new Controller. While Mr. Lum Kee had previous experience in public accounting, he had never before worked for a government contractor, nor had he ever made any political contributions either at the federal or state level.

Once he became Controller, Mr. Lum Kee was issued a company credit card in order to be able to pay company-related expenses (e.g., state registration renewals, travel, meals & entertainment).

Within a few months the owner, who was also the Chief Executive Officer ("CEO") and Managing Member, sent Mr. Lum Kee an email instructing him to use his corporate credit card to make a political contribution to the campaign of Susan Collins. Mr. Lum Kee made the contribution. Mr. Lum Kee, also at the request of the owner of the company, asked someone else to make a political contribution and reimbursed that person using company funds.

Mr. Lum Kee is scheduled to enter a guilty plea to one misdemeanor count of Making Conduit Contributions and aiding and abetting, in violation of 52 U.S.C. §§ 30122, 30109(d)(1)(a)(ii), and 18 U.S.C. § 2 in the United States District Court for the District of Columbia.

If you have any questions or need further information, please feel free to contact me at any time at either [REDACTED] or David@PriceBenowitz.com. Thank you.

Sincerely,

/s/

David Benowitz



FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC 20463

# STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness.

E-MAIL: [cela@fec.gov](mailto:cela@fec.gov)

AR/MUR/RR/P-MUR# MUR 7690

Name of Counsel: David Benowitz and Amy C. Collins

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E-mail: David@pricebenowitz.com or AmyC@pricebenowitz.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

3/24/2023

Date:

[Signature]  
(Signature - Respondent/Agent/Treasurer)

Title:

Lawrence "Kahele" Lum Kee

(Name - Please Print)

**RESPONDENT:** Lawrence "Kahele" Lum Kee

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 409 Seventh Street, NW, Suite 200, Washington, D.C. 20004  
(Please Print)

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This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

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